

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

A.B., a minor, by her next friends JULIE B., mother,
and ROSS B., father,

Plaintiff,

v.

BILL LEE, in his official capacity as Governor of
Tennessee, *et al.*,

Defendants.

No. 3:21-cv-00600
District Judge Richardson
Magistrate Judge Holmes

STIPULATION REGARDING STAY OF CASE AND ORDER

Plaintiff A.B., a minor, by her next friends Julie B., mother, and Ross B., father (“Plaintiff”), and Defendants Wilson County Board of Education, Jeff Luttrell, in his official capacity as Director of the Wilson County Schools, Bill Lee, in his official capacity as Governor of Tennessee, and Herbert Slatery III, in his official capacity as Attorney General of Tennessee (“Defendants”) (collectively, the “Parties”), by and through their attorneys of record, hereby stipulate and agree, and respectfully request that the Court enter an Order, as follows:

WHEREAS, Plaintiff represents to the Parties that Plaintiff’s family have decided to move to Chicago, Illinois after the conclusion of the current school year in light of recently enacted and proposed legislation in Tennessee affecting transgender rights, and in order to pursue a career opportunity for Plaintiff’s mother;

WHEREAS, Plaintiff anticipates dismissing this action upon her family's move to Illinois, but, out of an abundance of caution and because Plaintiff intends to complete the current school year in Tennessee, does not wish to dismiss the action until that time;

WHEREAS, Plaintiff's motion for a preliminary injunction (ECF No. 2) is still pending;

WHEREAS, under the Initial Case Management Order (ECF No. 70) as well as the Court's Order dated January 31, 2022 (ECF No. 80), several deadlines will or are likely to pass before Plaintiff's family's anticipated move;

WHEREAS, the Parties wish to conserve judicial resources and avoid any unnecessary burden and expense on the Parties;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Parties, that:

1. The case be stayed, and all currently scheduled deadlines be suspended.
2. Plaintiff's motion for a preliminary injunction (ECF No. 2) is hereby withdrawn without prejudice.
3. On or before July 29, 2022, either: (a) Plaintiff will move to dismiss this action; (b) the Parties will request an extension of this stay; or (c) if a change in circumstance leads a Party to believe that the stay should be terminated or modified in any way, the Parties will meet in good faith and file with the Court a proposed Order requesting such relief and proposing new deadlines for all currently scheduled events affected as a result, if any.

Dated: February 9, 2022

Respectfully submitted,

By: /s/ Tricia Herzfeld

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It is SO ORDERED.

Dated: February 10, 2022.

Eli Richardson

ELI RICHARDSON
United States District Judge